

Exhibit B

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

**THE PEOPLE OF THE STATE OF
CALIFORNIA,**

Plaintiff / Cross-Defendant,

v.

AMAZON.COM, INC.,

Defendant / Cross-Complainant

Case No. CGC-22-601826

**JOINT CASE MANAGEMENT
STATEMENT**

Date: January 18, 2024

Time: 9:00 AM

Dept.: 304

Judge: Hon. Ethan P. Schulman

Case Filed: September 15, 2022

Trial Date: August 10, 2026

**ELECTRONICALLY
FILED**

*Superior Court of California,
County of San Francisco*

**01/12/2024
Clerk of the Court**

**BY: WILLIAM TRUPEK
Deputy Clerk**

1 added documents will be subject to a later deadline. Until such time as the Parties reach agreement
2 on the scope of any additional documents to be included in the custodial review, Amazon is unable
3 to provide a date for substantial completion as it pertains to that presently unknown volume of
4 additional documents.

5 With respect to documents from centralized repositories, the AG's initial search terms
6 returned more than 70 million documents and, as subsequently revised, returned approximately 21
7 million documents. Earlier this week the AG raised for consideration the possibility that Amazon
8 also use TAR in connection with the review of documents from the centralized repositories. Once
9 the Parties have been able to meet and confer on that issue and reached agreement on an appropriate
10 path forward, Amazon will provide the AG with an anticipated substantial completion deadline.

11 The aforementioned categories of documents represent the entirety of the documents
12 Amazon has thus far agreed to produce in response to requests served prior to October 2023.

13 ***Written Discovery*** – The People served their first sets of requests for admission, form
14 interrogatories, and special interrogatories on Amazon on October 23, 2023. The People served
15 their second set of form interrogatories on Amazon on November 6, 2023. Amazon served its
16 responses and objections on December 22, 2023. The People are evaluating Amazon's responses
17 and will meet and confer to resolve any alleged deficiencies in Amazon's responses. At present,
18 there is no impasse regarding any dispute ripe to bring before the Court.

19 **B. Discovery Requested by Amazon**

20 ***Document Requests*** – Amazon has served two sets of requests for production of documents
21 on The People. The People represent that they have completed production in response to the first
22 set. The People completed production of documents in response to Amazon's second set of
23 document requests on January 12, 2024.

24 ***Written Discovery*** – Amazon served its first set of form interrogatories on February 17,
25 2023. The People served their responses and objections on March 21, 2023. The People
26 subsequently served supplemental responses on April 17, 2023 and September 29, 2023.

27 On September 21, 2023, Amazon served its first set of requests for admission, its first set
28 of special interrogatories, and its second set of form interrogatories on The People. The People

1 served their responses and objections on November 20, 2023. On December 22, 2023, Amazon
2 identified certain alleged deficiencies in The People's responses. The People responded on January
3 5, 2024, and the Parties have scheduled a meet and confer for January 19, 2024. At present, there
4 is no impasse regarding any dispute ripe to bring before the Court.

5 **C. Discovery from Third Parties**

6 To date, the Parties have completed four (4) third-party depositions. While several
7 additional depositions were originally scheduled to occur following the October 2023 Case
8 Management Conference and prior to the January 2024 Case Management Conference, only one
9 was completed. The remaining depositions were continued at the request of the third-party
10 deponents to provide additional time for them to collect and produce responsive documents and
11 coordinate with potential depositions in the other pending actions, including the case recently filed
12 by the Federal Trade Commission.

13 While The People reserve all rights to identify additional third-party deponents based on
14 their continuing discovery efforts, including Amazon's production of communications with
15 third-party sellers and vendors, The People have identified roughly twenty-five (25) additional
16 third-party depositions yet to be completed. At this time, Amazon has not identified or noticed the
17 depositions of any third parties beyond those noticed by The People.

18 **III. COORDINATION**

19 Notwithstanding extensive negotiations, including several lengthy conferences and the
20 exchange of multiple drafts, the Parties have not yet reached agreement on a proposed coordination
21 order governing discovery in the Action, including coordination with the action recently filed by
22 the Federal Trade Commission and other state attorneys general.

23 Amazon circulated comments regarding the proposed coordination order on January 3,
24 2024, and The People provided their response on January 4, 2024. Amazon provided its response
25 yesterday, January 11, 2024, and after the Parties met and conferred, they exchanged further drafts
26 earlier today, January 12, 2024.

27 A copy of the current draft coordination order is attached. The Parties' competing proposals
28 for the remaining disputed paragraphs are highlighted in yellow.